

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SEMYON (SAM) KISLIN,

Plaintiff,

14 CIV. 237 (PGG)(JCF)

-against-

DECLARATION OF
ALEXANDER
BERKOVICH

SIMON DIKKER and VADIM SACHKOV,

Defendants.

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1. I, Alexander Berkovich, Esquire, an attorney admitted to practice of law in this court, respectfully submit this Declaration in this matter in support of defendant Simon Dikker's motion to dismiss this action on the *forum non conveniens* grounds.

2. The following materials submitted in support of defendant Simon Dikker's Motion are accompanying this Declaration:

- (a) Declaration of Simon Dikker;
- (b) Declaration of Vadim Sachkov;
- (c) Jurisdictional deposition of Sam Kislin annexed as Exhibit A;
- (d) Electronic mail from David Kislin to Vadim Sachkov dated March 10 and March 19, 2014 annexed as Exhibit B;
- (e) Complaint annexed as Exhibit C;
- (f) Simon Dikker's Memorandum of Law.

Under the laws of the United States, I hereby declare under penalty of perjury that foregoing is true and correct.

Dated: Brooklyn, New York
June 9, 2014

Alexander Berkovich

ALEXANDER BERKOVICH